

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

SAMSON TUG AND BARGE CO., INC., )  
an Alaska Corporation, )

Plaintiff/Appellant )

vs. )

UNITED STATES OF AMERICA, )

acting by and through )

the UNITED STATES DEPARTMENT of )

the NAVY MILITARY SEALIFT )

COMMAND, and UNITED STATES )

DEPARTMENT OF THE ARMY )

MILITARY TRAFFIC MANAGEMENT )

COMMAND, )

Defendants/Appellees. )


Case Number: A03-006 CV Admiralty JWS

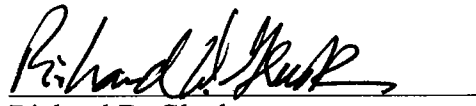
**SAMSON TUG'S MOTION FOR ORDER ALLOWING**  
**DISCOVERY OF DOCUMENTS PROTECTED BY THE PRIVACY ACT**

Comes now Plaintiff Samson Tug and Barge Co., Inc. ("Samson Tug") and files this motion to allow discovery of certain documents and records in the possession of the Defendant which may contain information provided by the Privacy Act, 5 U.S.C. §552(a). Samson filed an earlier motion seeking this relief believing it was not opposed. Counsel for Defendant, however, objected to the prospective reach of the proposed Order, and the application was denied.

The parties have conferred upon the terms of the Order and the Government no longer opposes this Motion. Samson Tug therefore requests that the Court endorse the proposed Order for the reasons cited therein.

Respectfully submitted this 13<sup>th</sup> day of March, 2006.

  
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Counsel for Plaintiff Samson Tug and Barge Co.,  
Inc.

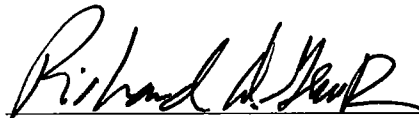
*Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2006, a copy of the foregoing Motion for Protective Order Allowing Discovery of Documents Protected by the Privacy Act was served by first class mail, postage prepaid to the following:

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Trial Attorney  
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United States Attorney  
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A handwritten signature in black ink, appearing to read "Richard D. Gluck", is written over a horizontal line.

Richard D. Gluck